

INITIAL CONFERENCE QUESTIONNAIRE

CASE NAME: 1567 56th Street LLC v. Spitzer, et al DOCKET NO.: 22-cv-4873 (KAM-RML)

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: 6/25/25
2. If additional interrogatories beyond the 25 permitted under Rule 33(a) of the Federal Rules of Civil Procedure are needed, the maximum number by: N/A
plaintiff(s)____ and defendant(s)____
3. Maximum number of requests for admission by: plaintiff(s)____ and defendant(s) 20
4. Number of depositions by plaintiff(s) of parties ____ non-parties
5. Number of depositions by defendant(s) of: parties 3 non-parties 4
6. Time limits for depositions: 7 hours
7. Date for completion of factual discovery: 11/31/25
8. Number of expert witnesses of plaintiff(s): ____ medical ____ non-medical
Date for expert report(s):
9. Number of expert witnesses of defendant(s): ____ medical 1 ____ non-medical
Date for expert report(s): 45 days after service of plaintiffs except report deadline
10. Date for completion of expert discovery: 45 days after service of defendant expert reports
11. Time for amendment of the pleadings by plaintiff(s) _____ or by defendant(s)
12. Number of proposed additional parties to be joined by plaintiff(s)____ and by defendant(s) and time for completion of joinder:
13. Types of contemplated dispositive motions: plaintiff(s): _____ defendant(s): SJ
14. Dates for filing contemplated dispositive motions: plaintiff(s):
defendant(s): _____ Anytime before 1/15/26

15. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. No

16. Will the parties *consent to trial before a magistrate judge pursuant to 28 U.S.C. §636? (Answer no if any party declines to consent without indicating which party has declined.)
Yes No No

17. This case should be ordered to arbitration at the close of discovery No _____ (yes/no)

18. This case should be ordered to mediation (now or at a later date) No _____ (yes/no)
(Prior to the Initial Conference, counsel shall discuss with their clients and their adversaries whether arbitration or mediation is appropriate in this case and be prepared to explain their reasons to the court)

* The fillable consent form AO 85 may be found at
https://www.nyed.uscourts.gov/forms/allforms/general_forms and may be filed electronically upon completion prior to the initial conference, or brought to the initial conference and presented to the Court for processing.